

Imperial Sand Dunes Recreation Area Business Plan

**Communication Plan
Imperial County, California**

**United States Department of the Interior, Bureau of Land Management
El Centro Field Office**

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Introduction

The Imperial Sand Dunes Recreation Area (ISDRA) 2012 Draft Business Plan, hereafter named the Imperial Sand Dunes Recreation Area (ISDRA) Business Plan and abbreviated as ISDRA BP, updates the 2003 ISDRA Business Plan.

The updated ISDRA BP is required to address the gaps between the agency objectives, customer needs, and management capacity. Without a modification to the fee program, drastic changes may occur to the ISDRA recreation program as a result of declining federal budgets and reduced opportunities for outside funding. These changes may include, but are not limited to, cuts in emergency medical services / search and rescue, maintenance of roads and camping areas, education efforts, and law enforcement.

Purpose

This communication plan is intended as a framework to guide the overall public affairs, outreach, education, and interpretive needs associated with the development of the ISDRA BP and implementation of an adjusted fee structure and schedule. This plan presents, and serves as a reference for, the communication goals, key messages and management actions associated with the ISDRA BP and fee implementation process.

Communication Goals and Objectives

Communication efforts relating to the ISDRA BP are required to serve two main goals:

- 1) All interested parties are informed on the process undertaken to develop the business plan, including opportunities for public involvement; and
- 2) ISDRA visitors are informed and educated of the resulting changes to the fee schedule and structure.

The following objective statements will guide all communication efforts relating to the ISDRA BP.

- Notify all interested and affected publics, agencies, and organizations about the business planning process, including the steps required by law and policy to implement the proposed fees.
- Notify all interested and affected publics, agencies, and organizations on timelines involved in the business planning and fee implementation process.
- Notify all interested and affected publics, agencies, and organizations on opportunities for formal and informal involvement in the process.
- Ensure broad distribution of information about the ISDRA BP via traditional news releases, social media, along with the dissemination of project related materials via the Internet, including linkage to project website: <http://www.blm.gov/ca/elcentro>

Key Messages

Key Message: Adjusted Fee

The ISDRA BP is proposing to adjust or revise the existing fee structure and schedule.

Communication Notes: *There are subtle differences in law, regulation and guidance on the process required to propose and implement an adjusted fee, as opposed to establishing a new fee. To avoid confusion it should be clearly stated in all communication that the ISDRA BP is an adjustment to existing fees.*

For clarification, the term “Fee Structure” should always be used to communicate the way fees are charged e.g., per person verses per vehicle. The term “Fee Schedule” should always be used to communicate the amounts of the fees.

The term “raise fee” is intentionally not used here. This is not to hide the intent of this fee proposal (which may result in higher fees), but to more accurately relate the proposal to BLM policy and guidance, and reflect that not all fees paid e.g., vendors fees, will necessarily increase.

Key Message: Level of Service

The level of service is explicitly tied to the amount of available funding. As funding declines, so does the level of service the BLM is able to provide. This has been most notable in the last 3 to 4 years with an overall reduction in Law Enforcement and additional staff assigned to the ISDRA during busy periods. Without an increase in fee revenue to sustainable and stable levels, the overall level of visitor services provided by the BLM will decline, this may include loss of access to areas, limited search and rescue capabilities, low levels of law enforcement and a lack of maintenance of existing facilities.

Communication Notes: *Level of Service refers to the number of law enforcement, emergency medical, visitor services and administration staff, the upkeep of facilities and general maintenance of the ISDRA.*

Key Message: Revenue Sources

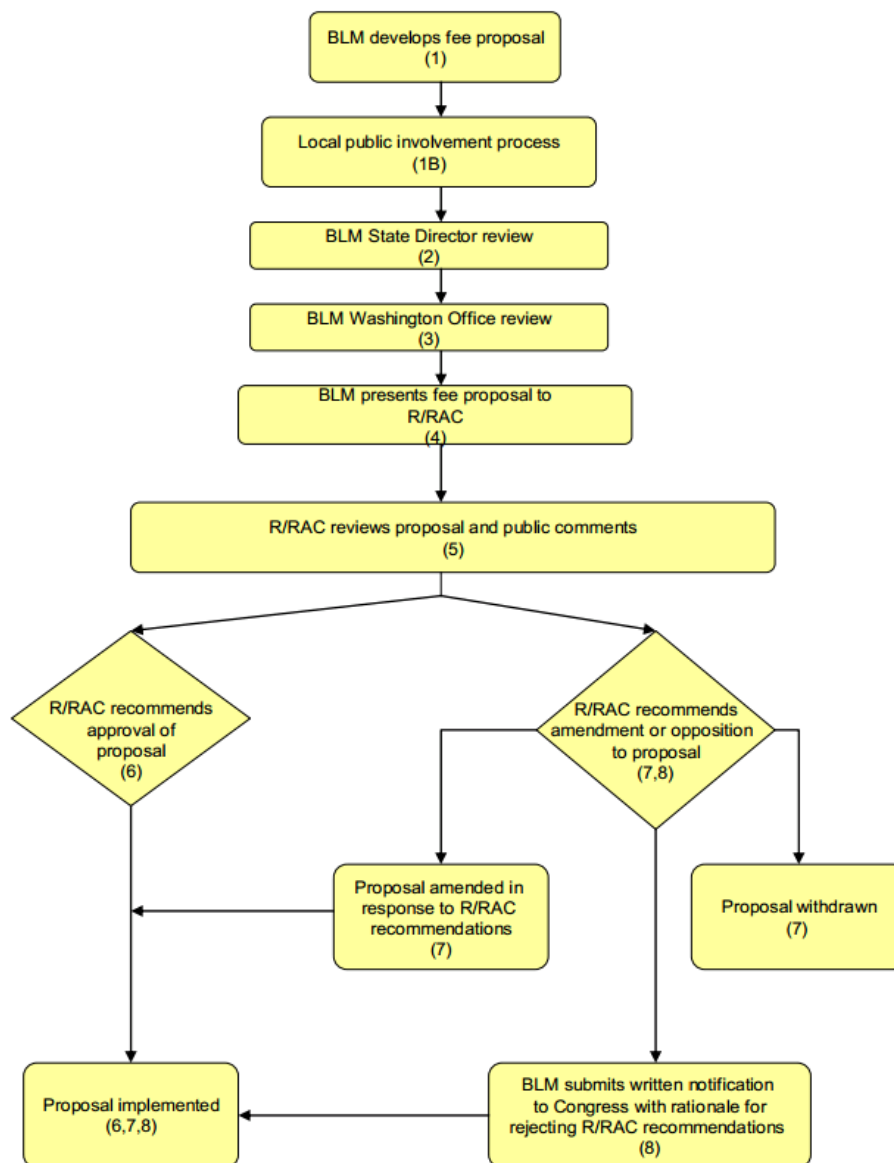
Currently the BLM uses its base funding, funds generated from fee collection and money acquired through grants to fund operations in the ISDRA. These revenue sources cannot be considered stable, as budget cuts are affecting both base funding and opportunities sought through grants, and funds generated from fee collect are dependent on overall visitation and levels of compliance.

Communication Notes: *When communicating revenue sources it should be clearly noted that the ISDRA is managed by the BLM, and not California State Parks. Thus, there is no commitment on the part of State Parks to fund operations at the ISDRA beyond those afforded in the various grant agreements that the BLM has successfully secured.*

Key Message: Review & Approval Process

In order to meet the statutory requirements set out in the Federal Lands Recreation Enhancement Act, the BLM established guidance to ensure Recreation Fee Proposals followed an appropriate “Review and Approval Process.” This process includes several elements of internal review and approval along the

external and public process required under various laws, including the Federal Advisory Committee Act. This process is best illustrated by the following flow chart:



Communication Note: When possible, communication regarding BLM's Recreation Fee Proposal Review and Approval Process should reference BLM IM 2007-028, BLM Manual 2930 (Recreation Permits and Fees), and BLM Handbook 2930-1 (Recreation Permit Administration). In addition, electronic links should direct people to the Washington Office R/RAC webpages, specifically http://www.blm.gov/wo/st/en/prog/Recreation/recreation_national/recreation_fees/_recreation_racs.html

Key Message: Final Fee Structure and Schedule

The final fee structure and schedule will be determined based on the recommendation provided by the R/RAC and a determination by BLM management. Once the final fee structure is decided, the public will be notified through numerous methods, including posting information signs on site and at BLM facilities, news releases to local media, updates to the BLM's web pages, posts on the ISDRA social media outlets, and distribution to email lists.

Communication Note: *Every effort should be made to get notification of the final fee structure and schedule out as soon as possible prior to implementation. At a minimum, the new fee should not go into effect until the public has had a minimum two weeks' notice (with 30 days' notice being greatly preferred).*

Key Audiences

Identification of the key audiences and their role in the overall process and implementation is critical to ensure the information is distributed efficiently and ultimately the project can be implemented successfully.

Internal

El Centro Field Office: The Field Office is the planning and implementing office for the ISDRA BP. All communication efforts and implementation actions will ultimately stem from the recreation, resources and management staff in this office. Throughout the planning process members of staff from various disciplines will be asked to participate in the process by providing input to and reviewing business planning documents, media releases and interpretive information.

California Desert District Office: The District Office provides support and guidance for the process, including facilitating communication within the BLM and with external interests. Typically the District Office is briefed on the draft and final documents and afforded the opportunity to review and edit before other levels of BLM management.

California State Office: Like the District Office, the State Office provides overarching guidance on the overall planning and fee implementation process. Staff and management at the State Office are briefed on the final proposal and given the opportunity to review and comment on the business plan prior to the Washington Office. In addition, the State Office acts as liaison with the Recreation Resource Advisory Council (R/RAC).

Washington Office: The Washington Office provides policy level guidance on the planning and implementation processes. Like the other levels of BLM, the Washington Office is briefed on the proposal and given the opportunity to review and comment on the business plan. The Washington Office performs the final review of the business plan prior to publishing the document.

External

ISDRA Visitors: The ISDRA visitors include individuals who are activity involved in the recreational experience provided by the dunes. These visitors are largely OHV enthusiasts, but also include desert

visitors whom enjoy dispersed camping, scenic viewing and other various recreation opportunities provided by the unique dune environment. It should be noted that a recent study (2006 ISDRA Visitor Profile) has shown this users group largely prefers to be communicated with via electronic methods, including email, webpages and social media.

Partners/Stakeholder Groups: Partners, such as the United Desert Gateway and American Desert Foundation, and stakeholder (special interest) groups, such as the American Sand Association and California Off-Road Vehicle Association, provide a key role in the successful management of the ISDRA. These groups assist in the dissemination of information to their members, directly aid in management at the dunes through volunteers and provide important feedback to BLM.

Local Businesses: Local business, and the Chambers of Commerce that represent them, have an active interest in the ISDRA. The ISDRA draws many out-of-town visitors, which in turn support a variety of local businesses from gas stations and hotels, to restaurants and auto-part stores.

Local Government: The local government of concern is specifically the Imperial County Board of Supervisors. Several existing partnerships with Imperial County are critical to operations in the ISDRA, including Law Enforcement agreements. Furthermore, the County has active interest in the socio-economic implications of any planning effort involving public lands. Opportunities to engage other local governments will be accommodated if requested.

Congressional Representatives: Due to the unique nature of the ISDRA, its proximity (approximately 3 hours from several major population centers – Los Angeles, San Diego and Phoenix) and the high visitation it receives, the area is of interest to numerous congressional representatives, including both those presiding over the local area, and others throughout California, Arizona and beyond.

Advisory Councils: The Recreation Resource Advisory Council (R/RAC) is a public advisory committee established by the U.S. Departments of the Interior and of Agriculture to provide recommendations concerning recreation fee proposals for public lands managed by the U.S. Forest Service and the BLM. Most new, or adjusted fee proposal are required to be formally presented to the council, whereupon the council will hear public concerns, review the supporting documentation and ultimately provide a recommendation to the State Director¹ either approving, modifying or opposing the fee proposal. In California, the BLM uses a U.S. Forest Service charter R/RAC and will coordinate appropriately with the U.S. Forest Service in matters pertaining to the R/RAC.

In addition to the R/RAC, the ISDRA is also of interest to the Desert Advisory Council (DAC) through its ISDRA subgroup. Although the DAC has been given the authority to provide recommendations on fee proposals, this would only be necessary in the absence of a chartered R/RAC.

¹ BLM guidance identifies this recommendation go to the State Director, while FLREA states the recommendation will be provided to the Secretary – it is assumed the State Director is the Secretary's designated appointee.

Public Process

Public participation has been, and continues to be, an important part of the planning process for the ISDRA. For any new or adjusted fee proposal, the BLM has developed guidelines establishing a general outline for public participation in order to meet the requirements set out in the Federal Lands Recreation Enhancement Act. This outline can be considered the mandatory steps in ensuring appropriate public involvement. It does not however, constitute the only steps that may be undertaken, as such, additional steps to ensure a higher level of communication concerning the development of an adjusted fee structure are described in the following.

Previous Public Participation

The public participation process for the Business Plan began in August 2010 with the August 31' 2010 ISDRA Desert Advisory Council (DAC) subgroup meeting. During this meeting members of the subgroup were asked to list important issues to be addressed in the plan. In addition, this meeting produced a vague outline of critical elements to the planning process and some potential ideas that could be considered as alternatives to the current fee structure and system.

Subsequent public meetings and outreach efforts to garner additional ideas and provide information updates occurred over the course of the next two years until the release of the 2012 Draft Business Plan on October 18, 2012. This release coincided with notification of a public comment period, which although originally scheduled to end on November 5, 2012 was extended until November 30, 2012. Although the comment period officially closed in November, comments continued to be received and reviewed, and as appropriate, incorporated into the development of the Final ISDRA BP.

These previously conducted public involvement opportunities constitute the "Local Public Involvement Process (1B)" as described on the flow chart previously presented in this document (figure 1).

Current Public Involvement

Currently the ISDRA BP is being revised and finalized based on internal review and public comment. As such, there is limited opportunity for the public to participate in the process. However, some substantial changes to the 2013 Draft Business Plan are occurring as a result of the comments received, and in an effort to ensure the public remains informed about these changes, the BLM is committed to providing information as it becomes available. This information will generally be provided via electronic means including the BLMs social media outlets and webpages. This Communication Plan and the Public Comment Content Analysis represent the first two documents being released in this fashion – they are released as information only, rather than for formal public comment. It is anticipated that other information will be made available prior to any formal public participation opportunities.

Future Public Participation Opportunities

There remains one statutory-required public participation opportunity in the Fee Proposal review and approval process. This is the presentation at the Recreation Resource Advisory Council (R/RAC) meeting regarding the fees. This is a formal public meeting, announced in the Federal Register 15 days prior to the meeting (BLM IM No. 2007-028) and in the local newspaper of record at least 1 week in advance. At the meeting, the way in which the public may participate is governed by guidelines developed by the

U.S. Forest Service whom, in California, charter the R/RAC and convene their meetings. The R/RAC takes the public's participation into consideration when making its recommendation to the State Director.

Prior to the R/RAC meeting, the BLM is required to post the proposed fees at the site where they will be implemented and provide information concerning the fees at the local office. In addition to this, the ISDRA BP will be made available, along with other supporting documents to aid in understanding, such as FAQs sheets, presentations, etc. on BLM webpages and promoted through the use of social media.

Public Education of Adjusted Fee Structure

As the adjusted fee structure is not considered "new fees," the requirement to post a notification in the Federal Register and wait six months before implementing the new fee is not applicable. Instead BLM guidance directs that notification of the adjusted fee in local media, at the site where the fees will be collected and at the local BLM office will suffice. In addition to this, the ISDRA staff will endeavor to publicize these fees in social media and on the BLMs webpages. Every effort will be taken to ensure partners and stakeholders groups are aware of the fee adjustments and are able to communicate them to their members.

Outreach

Outreach consists of the efforts to provide information, educate and interpret the ISDRA BP and fee implementation to the key audiences. There are many methods of conducting outreach, some appropriate for some key audiences, while others are preferred by different groups. In order to maximize outreach, the BLM will use a variety of outreach techniques throughout the course of the fee proposal and implementation process.

Internally, the ISDRA BP will receive multiple reviews at different levels of the agency to ensure the document is easily understood and the proposal is in compliance with the various governing rules and regulations. In addition, it will be reviewed to ensure it is implementing best management and returning fair value to the public for the unique services provided in the ISDRA. The internal outreach will primarily consist of briefing the District, State and Washington office, providing the document for review and engaging in a dialogue to ensure all internal comments are addressed. This internal process culminates with the approval of the ISDRA BP.

Outreach efforts to local and state government and any elected officials will also occur through briefings and presentations. These entities will generally, when possible, be briefed immediately prior to the public distribution of the final ISDRA BP and at any time during the process that they request an information update.

The DAC and ISDRA subgroup will be offered an information update at its regularly scheduled public meetings. These updates will focus on where the ISDRA BP is in the process and any key information regarding changes between the draft and final documents. The R/RAC will be briefed in a formal presentation on the entire document at the meeting on which the ISDRA fee proposal is on the agenda. Prior to this meeting, the members of the council will be provided a copy of the ISDRA BP.

ISDRA visitors, partners and stakeholder groups will continue to be informed on the process through the BLM's webpage, ISDRA Facebook and mass emails. As appropriate, formal press-releases will be used, along with information handed out during camp and ranger station contacts. If funding allows, and BLM is invited, it may attend stakeholder groups meetings to provide information on the process.

Schedule

The following (Table 1) outlines the proposed schedule for completion of the ISDRA BP, proposal review and final approval process, if this schedule requires adjustments a standalone schedule will be updated and made available on the BLM's ISDRA website:

Schedule Item	Proposed Date
Internal Review of Schedule/Content Analysis/Communication	January 28 th - January 30 th 2013
Brief State Director/Staff of Proposed Course of Action	January 31 st 2013
Publish Public Comment Content Analysis – Website Download ¹	February 1 st 2013
Publish Proposed Schedule – Webpage Only ¹	February 1 st 2013
Publish Communication Plan – Website Download Only ²	February 8 th 2013
Revise Business Plan	January 28 th – March 17 th 2013
Public Information Update ¹ [Video ³]	March 1 st 2013
District Office Briefing	March 22 nd 2013
District Office Review	March 25 th – April 5 th 2013
Address District Office Comments	April 8 th – April 12 th 2013
State Office Briefing	April 15 th 2013
State Office & Washington Office ⁴ Review	April 15 th – April 26 th 2013
ISDRA Subgroup Update – Information Only	April 18 th 2013
Address State & Washington Office Comments	April 29 th – May 8 th 2013
State Director Briefing	May 9 th 2013
State Director Approval	May 9 th 2013
Washington Office Briefing	May 13 th 2013
Washington Office Final Review	May 13 th – May 24 th 2013
Address Any Remaining Internal Comments	May 24 th – May 31 st 2013
Business Plan Approved	May 31 st 2013
Brief Appropriate Counties, State Agencies and Congressional Representatives	June 3 rd – June 14 th 2013
Publish Business Plan – Website Download Only ¹	June 8 th 2013
Brief DAC ⁵ – Information Only	June 8 th 2013
Various Public Outreach Efforts ⁶	June 10 th – June 21 st 2013
RRAC Presentation / Recommendation	Mid June (14 th /22 nd) 2013
- Address non-affirmation/modification if applicable	July 1 st – August 1 st 2013
Notice Public of Final Permit Structure/Amounts ⁷	August 1 st 2013
Initiate Permit Sales	September 1 st 2013

² Note availability on Facebook

³ Potential Method of updating the public on changes between Draft & Final, a PowerPoint Presentation may also be used, or updated FAQs posted etc.

⁴ Washington Office is provided a concurrent review process to ensure comments can be incorporated in a timely fashion

⁵ May be dropped from schedule if DAC does not require a briefing

⁶ May include increased social media coverage, traditional press, presentations made available online, etc.

⁷ Notification will occur through local media, BLMs websites and social-media. Information will be provided to partners and stakeholder groups for dissemination

Frequently Asked Questions (FAQs)

The following FAQs serve as a quick reference concerning the business planning process and fee implementation.

Where can I find information on for the Imperial Sand Dunes Recreation Area Business Planning Process and Proposed fee structure and schedule?

As information becomes available it will be posted on the BLM website and updates made on the ISDRA Facebook page. The website can be viewed at <http://www.blm.gov/ca/st/en/fo/elcentro/recreation/ohvs/isdra.html>, while the ISDRA Facebook page can be seen at <https://www.facebook.com/BLMImperialSandDunes>. To receive ISDRA updates in your Facebook newsfeed please “Like” the above page. In addition to these two main mechanisms of disseminating information, email lists, traditional media outlets, BLM newsletters and information on-site (at the El Centro Field Office and ISDRA), will be used.

Why does the current fee structure and schedule need revising?

The current fee structure has been in place since 2003 and the current fee schedule since 2004. The original fee structure served to offset some of the costs of management, while other revenue streams – such as base funding and grants, covered the majority of the costs. With declining federal budgets, and a reduction in available grant monies, the stability of funding for the ISDRA is in question. In order to maintain facilities and continue to provide appropriate levels of service, fee revenue needs to be increased to cover reductions in base funding and available grants.

What opportunities for public involvement does the business planning process afford?

The business planning process was initiated with a public scoping meeting in 2010. Since then the public has been given the opportunity to review a draft business plan and provide written comments. The public will continue to be informed on the process as the final business plan is developed. The only remaining public comment process, however, is that provided at the R/RAC meeting where the BLM will present its proposal in order to receive a recommendation from the council on the proposal. The specifics governing how the public can engage at this meeting are governed by the U.S. Forest Service whom in California convenes the meetings of this council.

I missed the publication and the draft document and the comment period, can I still participate in the process?

Yes. Although the opportunities to comment on, and provide direct input to, the business plan itself have past, a number of opportunities to become engaged in the process remain. These include participation in dialog occurring on the ISDRA Facebook page, review of the final published document, and participation at the R/RAC meeting where the council will review the proposal and provide a recommendation to the BLM on the proposed fees.

If the Recreation Resource Advisory Council does not recommend proceeding with the fee proposal can the BLM still move forward?

Yes. The Recreation Resource Advisory Council may oppose or modify the BLM's proposal. If a modification is mutually acceptable, the BLM can move forward with the modification. If the council opposes the proposal, an internal dialogue must take place to ensure all levels of BLM management wish to move forward with the proposal. If so, a written notification to Congress must be prepared for rejecting the R/RAC recommendation.

When will the new fee structure and schedule be implemented?

The current timeline proposes the implementation a revised fee structure and schedule to coincide with the 2013/2014 visitor-use season; with an anticipated initiation date of September 1, 2013. It should be noted that this proposed date may change based on the various internal review cycles and public/advisory council participation procedures.

Are Imperial Sand Dunes vendors impacted by the revised fees?

Yes. A revised fee structure and schedule is being investigated and proposed for individual visitors to, and commercial vendors operating within, the ISDRA. The fee proposals associated with vending are presented in a separate section of the ISDRA BP.

Where will I be able to buy my Imperial Sand Dunes Recreation Area passes/permits?

At this time it has not been determined exactly how the revised fee structure will impact the resale of passes/permits, and therefore the exact locations where they may be purchased is unknown. The BLM is, however, exploring multiple options including traditional sales outlets, online outlets and availability from BLM facilities.